



New Orleans Educational Telecommunications Consortium
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUN - 7 1993

FCC MAIL ROOM

Ms. Donna R. Searcy
Secretary, FCC
1919 M. St., N.W.
Washington, DC 20554

Dear Ms. Searcy:

This is to express our opposition to "channel loading" per Notice of Proposed Rule Making in MM Docket No. 93-106.

Channel loading would eliminate the educator's ability to transmit two programs simultaneously and thereby jeopardize the ITFS operators ability to provide services on a cost-feasible basis.

Channel loading is also a dangerous step toward direct licensure for interests who must now lease excess capacity from the licensees.

Many ITFS licensees are just beginning to activate their systems. Although educational usage of the ITFS spectrum was slow in coming, it appears that many educational entities are now beginning to implement ITFS delivery systems. Balanced agreements with wireless cable operators has made acquisition of these systems possible for many ITFS operators. Channel loading will upset this balance in favor of the commercial interests and thereby endanger development of this vital educational resource.

On behalf of the colleges and universities of New Orleans, Louisiana, I urge that the Commission reject the concept of channel loading.

Very truly yours,

Robert J. Lucas
Executive Director

cc: Members of the Louisiana
Congressional Delegation

NOETC MEMBERS:

DELGADO COMMUNITY COLLEGE
DILLARD UNIVERSITY
LOYOLA UNIVERSITY
SOUTHERN UNIVERSITY IN NEW ORLEANS
TULANE UNIVERSITY
UNIVERSITY OF NEW ORLEANS
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